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U S NAVY RESPONSES TO NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND  
NATURAL RESOURCES AND U S EPA REGION IV COMMENTS ON THE DRAFT REMEDIAL  
INVESTIGATION/FEASIBILITY STUDY FOR OPERABLE UNIT 25 (OU 25) SITE UXO-19  
CAMP DEVIL DOG MCB CAMP LEJEUNE NC  
3/19/2014  
CH2M HILL

**Response to Comments**  
**Draft Remedial Investigation/Feasibility Study**  
**Site UXO 19, Operable Unit 25**  
**Marine Corps Installations East – Marine Corps Base Camp Lejeune**  
**(MCIEAST-MCB CAMLEJ), North Carolina**

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## **Introduction**

The purpose of this document is to address comments on the Draft Remedial Investigation/Feasibility Study (RI/FS) for Site UXO-19, Operable Unit (OU) 25. The North Carolina Department of Environment and Natural Resources (NCDENR) and The United States Environmental Protection Agency (USEPA) provided the comments listed below. The responses to comments are provided in bolded text.

## **North Carolina Department of Environment and Natural Resources**

### **Comments (Dated December 6, 2013)**

1. The comparative Summary Table of Remedial Alternatives on Page XI and Table 10-3 of Section 10, discusses Short Term Effectiveness. The Short Term Effectiveness of alternatives 2, 3, and 4 should usually be the same. However, Alternative 2 would be more effective in the short term at this UXO Site due to the dangers associated with excavation and removal of MEC in Alternatives 3 and 4.

**Agree, the short-term effectiveness of Alternative 2 is rated high, whereas the short-term effectiveness of Alternatives 3 and 4 is moderate and low, respectively.**

2. Alternative 1, No Action, is not effective in the short term or the long term. Therefore, the short term effectiveness of Alternative 1 should be Not Applicable (NA) or Low.

**Typically the No Action alternative would have low short-term effectiveness; however, Alternative 1, No Action, was given a high rating for short-term effectiveness because the subsurface MEC removal has significantly lowered the explosive hazard at the site. While LUCs would not be implemented, the accessibility of the site based on current and short-term future land use (restricted military base) also support a higher short-term effectiveness than the typical No Action alternative. Because LUCs (Alternative 2) would be more effective than No Action, the short-term effectiveness rating for Alternative 1 will be changed to "Moderate".**

3. David Lilley with the Division of Waste Management will be providing a review of the Risk Screening Sections of the Report. His comments will be provided at a later date.

**Comment noted.**

#### **Division of Waste Management Comments (dated March 13, 2014)**

4. Appendix G, Table G.3a: Please change “Residential Soil RSL” in the fifth column to “Residential Tap Water RSL”.

**This change has been made to Table G.3a.**

#### **United States Environmental Protection Agency**

##### **Comments (dated February 5, 2014)**

1. Section 9.2.3, Page 9-3: The disposal procedures should be added to this section similar to Alternative 4.

**A reference to disposal procedures in Section 4.4 will be added to Section 9.2.3.**

2. Table 9-1: Define GRAs

**GRA is “general response action”, since the table refers to “technology” in the header, the term “GRA” will be replaced with “technology”.**